

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Stream TV Networks, Inc., (Stream) Debtor.	Chapter 11 Bky. No. 23-10763 (MDC)
In re: Technovative Media, Inc., (Technovative) Debtor.	Chapter 11 Bky. No. 23-10764 (MDC) (Jointly Administered)
STREAM TV NETWORKS, INC. and TECHNOVATIVE MEDIA, INC. Plaintiffs, -v. SHADRON L. STASTNEY, <i>et al.</i> , Defendants.	Adversary No. 23-00057

**REMBRANDT 3D HOLDING LTD.'S MOTION FOR EXPEDITED
CONSIDERATION, SHORTENED TIME, AND LIMITED NOTICE OF
MOTION SEEKING (I) ENFORCEMENT OF THE TEMPORARY RESTRAINING
ORDER, (II) SANCTIONS AGAINST PARTIES WHO VIOLATED THE TEMPORARY
RESTRAINING ORDER, AND (III) INJUNCTIVE RELIEF(ECF NO. 824)**

**TO THE HONORABLE ASHLEY M. CHAN,
UNITED STATES BANKRUPTCY JUDGE:**

Rembrandt 3D Holding Ltd. ("**Rembrandt**"), by and through his undersigned counsel,
files this Motion for Expedited Consideration, Shortened Time, and Limited Notice of its Motion

seeking (1) enforcement of the Temporary Restraining Order (the “**TRO**”) issued January 4, 2024¹ and extended through December 9, 2024²; (2) sanctions against parties who have violated the TRO or were complicit in such violations; and (3) injunctive relief preventing the sale of the assets held by Stream TV Networks, Inc. (“**Stream**”) and Technovative Media, Inc. (“**Technovative**,” and with Stream, the “**Debtors**”) which include the intellectual property of Rembrandt (Docket No. 824) (“Motion to Enforce TRO”). In support of this Motion for Expedited Consideration, Rembrandt respectfully represents to the Court as follows:

Jurisdiction & Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This Motion constitutes a core proceeding as defined under 28 U.S.C. § 157(b)(2)(A) and constitutes a contested matter pursuant to Bankruptcy Rules 9014 and 9020.

General Background

3. On September 30, 2024 William A. Homony, in his capacity as Chapter 11 Trustee of the bankruptcy estates of Stream TV Networks, Inc. (“Stream”) and Technovative Media Inc (“Technovative” or in conjunction with Stream, the “Debtors”) (the “Trustee”) filed a *Motion for (I) an Order (A) Approving Bidding Procedures and Form Asset Purchase Agreement for the Sale of Substantially all of the Debtor’s Assets Including Approval of the Provisions for Designation of a Stalking Horse, (B) Establishing the Notice Procedures and Approving the Form and Manner of Notice Thereof and scheduling and Auction, (C) Approving Procedures for Assumption and Assignment of Certain Executory Contracts and Unexpired Leases (D) Scheduling a Sale Hearing,*

¹ Adversary Case 23-00057-amc, docket no. 119

² Adversary Case 23-00057-amc, docket no. 152

and (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g); and (F) Granting Related Relief and (II) an Order Approving (A) the Sale of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto and (C) Granting Related Relief [ECF No. 750] (the “Sale Motion”).

4. On November 20, 2024 the Court issued an Order granting the Sale Motion, granting the proposed Bidding Procedures, and scheduling a Sale Hearing on December 4, 2024 (Docket No. 811) ("Sale Procedures Order").

5. On November 26, 2024 Rembrandt filed its Motion to Enforce TRO, which in turn seeks relief that if granted will significantly affect the Trustee's proposed sale, which seeks, in Rembrandt's view, to sell its IP in violation of the agreement between itself and the Debtors.

Grounds for Relief

6. In accordance with L.B.R. 5070-1(f) and 9014-1, Rembrandt seeks expedited consideration of its Motion to Enforce TRO. Rembrandt requests approval of the request for expedited consideration pursuant to L.B.R. 9014-2.

7. Rembrandt respectfully submits that expedited consideration of the Motion to Enforce TRO is required well in advance of the Sale Hearing because of the relief sought, which significantly affects the Trustee's proposed sale.

8. Rembrandt further believes that an expedited hearing of its Motion to Enforce TRO will not prejudice the Trustee or any of the Debtors' creditors and is, in fact, in the best interest of all effected parties and creditors as Rembrandt believes if the Trustee's proposed sale goes forward, the value of Debtors' IP will be destroyed.

9. Rembrandt further requests (a) that this Court permit notice of the hearing to be served via facsimile, hand delivery, next day air, or by electronic means upon (i) the Office of the United States Trustee; (ii) to the Chapter 11 Trustee; and (iii) all parties who have timely filed requests for notice under Bankruptcy Rule 2002, and (b) that this Court limit the notice period accordingly.

10. Rembrandt believes that such notice is sufficient under the circumstances for the expedited hearing.

11. Reduction of the time periods in question is not prohibited under Fed. R. Bankr. P. 9006(c)(2) and the rules listed therein.

CONCLUSION

WHEREFORE, Rembrandt respectfully requests that this Court enter an Order, in the form annexed hereto as **Exhibit “A”**, granting this Motion and (i) allowing Rembrandt 's Motion Enforce TRO to be heard on an expedited basis well in advance of the Sale Hearing; and (ii) granting such other and further relief as the Court deems just and proper under the circumstances.

Dated: November 27, 2024

/s/ Andrew DeMarco
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Attorneys for Rembrandt 3D Holding Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the United States Bankruptcy Court for the Eastern District of Pennsylvania on November 27, 2024 with notice sent electronically to all parties receiving electronic notices in this case pursuant to local rules of this Court, and that no further notice or service is necessary.

/s/ Andrew DeMarco

Andrew DeMarco, Esq. (PA Bar No. 326294)

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Rembrandt met and conferred with the Trustee's counsel regarding this expedited request. The Trustee's counsel did not agree to the expedited setting of Rembrandt 's Motion to Enforce TRO.

/s/ Andrew DeMarco

Andrew DeMarco, Esq. (PA Bar No. 326294)

EXHIBIT A
PROPOSED ORDER

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re

STREAM TV NETWORKS, INC.,

Debtors.

Chapter 11

Case No.: 23-10763 (AMC)
(Jointly Administered)³

**ORDER GRANTING REMBRANDT 3D HOLDING LTD'S MOTION FOR EXPEDITED
CONSIDERATION, SHORTENED TIME, AND LIMITED NOTICE**
[re: DOCKET NO. 824]

Upon consideration of Rembrandt 3D Holding Ltd. (“**Rembrandt**”) Motion for Expedited Consideration, Shortened Time, and Limited Notice (the “**Motion**”) of its Motion seeking (1) enforcement of the Temporary Restraining Order (the “**TRO**”) issued January 4, 2024⁴ and extended through December 9, 2024⁵; (2) sanctions against parties who have violated the TRO or were complicit in such violations; and (3) injunctive relief preventing the sale of the assets held by Stream TV Networks, Inc. (“**Stream**”) and Technovative Media, Inc. (“**Technovative**,” and with Stream, the “**Debtors**”) which include the intellectual property of Rembrandt (Docket No. 824) (the “**Motion to Enforce TRO**”). The Court having reviewed the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C.

³ On April 11, 2023, the Court entered an order directing joint administration of the above-captioned case and *In re Technovative Media, Inc.*; Case No. 23-10764 (AMC). (D.I. #81).

⁴ Adversary Case 23-00057-amc, docket no. 119.

⁵ Adversary Case 23-00057-amc, docket no. 152.

§ 157 and 1334, and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2);

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Court shall hold a hearing on Rembrandt's Motion to Enforce TRO (Docket No. 824) on _____
3. Rembrandt is to file its Notice of Motion as it relates to its Motion to Enforce TRO, in accordance with Local Bankruptcy Rules.

Dated: November __, 2024.

ASHLEY M. CHAN
United States Bankruptcy Judge